

EXHIBIT A

WILMER CUTLER PICKERING
HALE AND DORR LLP

December 27, 2005

S. Calvin Walden

By E-Mail

David R. Brightman, Esq.
Ropes & Gray LLP
525 University Avenue
Palo Alto, CA 94301

399 PARK AVENUE
NEW YORK, NY 10022
+1 212 937 7215
+1 212 230 8888 fax
calvin.walden@wilmerhale.com

Re: Ampex Corporation v. Eastman Kodak Company, et al

Dear David:

This letter is sent to address various outstanding discovery issues discussed in your letters of December 6, 13, and 16, 2005, as well as last week's inspection of Kodak's electronic documents in New York.

Ampex's 30(b)(6) Notice

We are still working with our client to determine witnesses and dates in response to Ampex's 30(b)(6) notice. We expect to provide dates in mid-January by the end of this week or early next week.

Inspection of Kodak's Documents

We understand that, on Friday December 23, Ampex concluded the inspection of the 4 technical "hard drives" (three from the Chino City inspection, and one additional covering the newer cameras), as well as the "marketing" servers in Lotus Notes databases. We have agreed to hold a conference-call in early January to discuss any follow-up inspection that Ampex may request of these electronic documents. Tomorrow we will be producing copies (in TIFF-image format) of those documents that your team printed out last week during the inspection. We are also working with the Skyline vendors to produce the remainder of the documents that were marked for later production. We understand that the technical documents should be given priority given the upcoming depositions in Japan on January 17-20. Skyline will be billing your firm directly for the copy costs.

You assert in your December 13, 2005 letter that the inspection which took place last week was not expected to cover Ampex document request nos. 20, 21, 22, 27, 28, 29, 30, 38, 39, 40, 41, 59, 60, 61, 62, 63, 65 and 66. We hope that, after your team was able to actually inspect the electronic documents we made available (as well as the 13,000+ page production we made a few weeks ago), you would agree that we have produced a significant amount of documentation in response to request nos. 27, 28, and 38-40. In addition, we have either produced, or scheduled

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on a privilege log, documents in response to request nos. 59-63. We expect to make a production of additional documents responsive to request nos. 20-22, 29-30, 41, and 65-66 by January 6, 2006, and will also let you know at that time the status of any further collection, review and production regarding these requests.

Your assertion in your December 13, 2005 that "Ampex will move to strike any document that Kodak intends to rely upon at trial that is responsive to [requests nos. 27, 28, and 61-63] and was not actually produced but instead only made available for inspection" is misguided. Documents made available for inspection and copying *are* produced under Fed. R. Civ. P. 34. We have not limited Ampex's right to have copies made of any documents that were made available in the inspection. Thus, the entirety of the inspection materials, along with the other materials separately produced to Ampex, constitutes Kodak's production. We of course reserve the right to supplement our production as discovery proceeds and new documents are uncovered.

Document Request No. 23 to Kodak

We can agree to produce correspondence that refers substantively to the '107 and/or '831 patent by January 13, 2006.

Document Request Nos. 46 and 47 to Kodak

As we have informed you previously, at the end of the year it is difficult to get "numbers" from our client. We are thus still determining an answer to your inquiry as to how Kodak accounts for sales of paper and ink for its printer docks. We will also be getting you Q3 numbers shortly after the new year, and Q4 numbers when they become available.

Production of Remaining Source Code

We are collecting from Altek the source code for the CD40, CX4200, CX4210, CX4230, CX4300 and CX4310 cameras, and expect to produce it shortly. I am still waiting for word back on my enquiry as to whether Kodak has, and can produce, a copy of the source code for the C340 camera.

Very truly yours,



S. Calvin Walden

cc: Norman Beamer, Esq.
Jesse Jenner, Esq.
Jack B. Blumenfeld, Esq.
Paul M. Lukoff, Esq.